



December 3, 2020

**BY ECF**

Hon. Mary Kay Vyskocil  
United States Courthouse  
Southern District of New York  
500 Pearl Street,  
New York, New York 10007-1312

Re: ***Leramount LLC v. Gary Tatintsian Gallery, et. al., Case No. 20 Civ. 2435 (MKV)***

Dear Judge Vyskocil:

This firm represents Defendants in the above-referenced matter, and we submit this letter jointly with Michael Goldman of Lydecker Diaz, attorneys for Plaintiff. We write pursuant to your Honor's text Order on October 22, 2020 (Dk. 19) to update the Court on our progress. The parties have recently reached an agreement in principle that would resolve all issues between them, which is subject only to memorialization. We ask the Court for a stay of all deadlines until January 4, 2020, while the parties document their settlement, which would culminate in a dismissal with prejudice.

Respectfully submitted,

/s/R. Zachary Gelber

R. Zachary Gelber  
Gelber & Santillo PLLC  
347 W. 36<sup>th</sup> St., Suite 805  
New York, NY 10018  
212-227-4743  
[zgelber@gelbersantillo.com](mailto:zgelber@gelbersantillo.com)  
*Attorneys for Defendants*

Respectfully submitted,

/s/Michael Goldman

Michael Goldman  
Lydecker & Diaz  
200 Broadhollow Road, Suite 207  
Melville, NY 11747  
631-260-1110  
[mgoldman@lydeckerdiaz.com](mailto:mgoldman@lydeckerdiaz.com)  
*Attorneys for Plaintiff*